



Patent  
Attorney's Docket No. 1033048-000058

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent Application of	)	<b>MAIL STOP AMENDMENT</b>
Gordon Good	)	
Application No.: 09/852,244	)	Group Art Unit: 2137
Filed: May 10, 2001	)	Examiner: PAUL E CALLAHAN
For: SECURITY POLICY MANAGEMENT	)	Confirmation No.: 4076
FOR NETWORK DEVICES	)	
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**REQUEST FOR RECONSIDERATION**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

In response to the Office Action dated January 30, 2006, Applicant respectfully requests reconsideration and withdrawal of the rejection of the claims.

Claims 1-36 stand rejected under 35 U.S.C. §102, on the grounds that they are considered to be anticipated by the Rothermel et al patent (U.S. 6,678,827). For the reasons set forth in Applicant's previous response, and discussed further hereinafter, it is respectfully submitted that the Rothermel patent does not anticipate the subject matter of the pending claims.

In responding to Applicant's previous arguments, the most recent Office Action notes that one of the points of distinction identified by Applicant is that the Rothermel patent does not disclose the claimed steps of expanding at least one template at a central location and providing the expanded information to a plurality of computing devices. In response, the Office Action states "yet a careful reading of Rothermel shows that such is indeed taught at the passages cited, most particularly in col. 5, lines 1-10." It is respectfully submitted that this statement does not support

the rejection. In particular, on pages 10-11 of the previous response, Applicant explained what a careful reading of the Rothermel patent suggests to a person of ordinary skill in the art. At column 5, lines 1-3, it discloses that each of the network security devices (NSDs) is first provided with a copy of the template. Thereafter, as disclosed at lines 3-13, "Each of the NSD template copies can *then* be configured with NSD-specific information. . ." (emphasis added). Thus, the Rothermel patent clearly discloses that a copy of the template is first provided to each NSD, and thereafter each of the template copies at the NSDs are individually configured with information specific to their respective NSDs. To the extent that the configuring of the templates can be interpreted to correspond to the claimed step of expanding at least one template, the Office Action does not explain how this passage can be interpreted to teach that such "expansion" takes place at a central location. Rather, the patent clearly teaches that the configuring of the templates occurs at the individual NSDs.

Since the templates are not configured until after they are provided to the NSDs, the Rothermel patent also cannot be interpreted to teach the final step of claim 1, namely providing the *expanded* information to the plurality of computing devices. In the system of the Rothermel patent, the configuring of the template takes place *within* the individual NSDs. The configured template is not provided to the individual NSDs.

If the rejection of claim 1 is not withdrawn, the Examiner is requested to specifically identify (1) what is being interpreted to be the central location in the Rothermel patent, and (2) where the patent discloses the expansion of a template at

that central location. In the absence of such showings, it is respectfully submitted that the rejection cannot be maintained.

Claim 8 recites, among other features, a communications gateway that performs three functions, namely (a) retrieve individual templates, (b) expand the retrieved templates to create documents containing template information combined with expanded information, and (c) provide the documents containing the combined information to a plurality of agents. This claim is rejected with reference to the same passage in the Rothermel patent that was cited in connection with claim 1, namely column 4, line 49, through column 5, line 13.<sup>1</sup> Again, however, the Office Action does not explain how the reference is being interpreted to suggest the claimed subject matter. Specifically, it does not indicate what element disclosed in the Rothermel patent is considered to correspond to the claimed communications gateway. It appears that the supervisor device described in the cited passage is being interpreted as a communications gateway, since it is logically located between the manager device and the NSDs. However, there is no disclosure that this supervisor device performs the functions recited in claim 8. In particular, there is no disclosure that it functions to expand templates to create documents containing combined template information and expanded information, and to thereafter provide these documents containing the combined information to a plurality of agents. Rather, as discussed previously in connection with claim 1, the supervisor devices simply forward copies of the template on to the NSDs. To the extent that any

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<sup>1</sup> It is noted that the citation is incomplete on page 5 of the most recent Office Action. Based upon the first Office Action dated July 28, 2004, Applicant is inferring that the same passage is being relied upon.

"expansion" takes place, that is carried out within the individual NSDs, and not at the supervisor device.

Again, Applicant respectfully requests that, if the rejection of claim 8 is not withdrawn, the Examiner explain, with particularity, (1) what element of the Rothermel patent is being interpreted to correspond to the claimed communications gateway, (2) where the Rothermel patent discloses that such a "gateway" performs each of the three functions recited in claim 8, and (3) what element of the Rothermel patent is being interpreted to constitute the claimed document containing combined template information and expanded information that is provided to a plurality of agents. In the absence of such showings, it is respectfully submitted that the rejection of claim 8 cannot be maintained.

Claim 22 recites, among other steps, that of retrieving a template that pertains to a given device and "creating a document comprising a listing of users identified in said template and users identified by any externally referenced information." The Office Action does not contain a specific explanation of the basis for the rejection of claim 22. In particular, it does not identify what element of the Rothermel patent is being interpreted to correspond to the claimed document. As best as can be surmised from the rejection of claim 14, the Examiner appears to be relying upon the template 300 or the security policy 315 of Figure 3B as being such a document. However, the Rothermel patent does not disclose that this document comprises a list of users identified in a template and users identified by externally referenced information, as recited in claim 22. There is no disclosure of users in connection with this figure. Rather, information 311 contained within the network profile 310 comprises aliases to network elements, i.e. devices. Information 316 in the policy

315 comprises rules. Figure 3B of the Rothermel patent does not disclose a document containing a listing of users derived from two different sources, as recited in claim 22.

With reference to claim 31, Applicant's previous response pointed out that this claim recites, among other elements, that at least one template includes a conditional statement, along with the further step of creating a document comprising a listing of users identified in a retrieved template and "users identified in any conditional statement if said given device meets the condition." In responding to Applicant's arguments traversing the rejection of this claim, the most recent Office Action states that the Rothermel patent teaches a conditional statement at Figure 3H, and a listing of users in Figure 3B.


First, as noted previously in connection with claim 22, Figure 3B of the Rothermel patent does not disclose a template containing a listing of users. Rather, it only discloses network devices, and rules. Second, even if the subject matter of Figure 3H can be interpreted to disclose a conditional statement, there is no relationship between this conditional statement and a listing of users. Rather, the reference portion of the figure relates to types of *content*, and whether those types are considered to be safe. There is no disclosure suggesting that users are identified in the safe content dialog box of Figure 3H.

In view of the foregoing, it is respectfully submitted that the Rothermel patent does not teach all of the features recited in each of the independent claims. For at least these reasons, therefore, the rejection based upon anticipation is not supportable. Reconsideration and withdrawal of the rejection is respectfully requested.

Respectfully submitted,

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